

DECLARATION OF KIMBERLY BROWN-WIGGINS

I, Kimberly Brown-Wiggins, hereby submit the following Declaration, under penalty perjury, based upon my personal knowledge of the following facts:

1. My name is Kimberly Brown-Wiggins. I am employed by Cuyahoga County as a Correction Officer at the Cuyahoga County Corrections Center ("CCCC"). I have been employed as a Correction Officer since July of 2004. I am currently a Corporal, tasked with supervising other Correction Officers.
2. My primary responsibilities involve maintaining security of the jail, ensuring inmate safety, proactively engaging with inmates to reduce the incidences of fighting and other disturbances amount the inmate population, observing and influencing inmate behavior and conducting inspections for contraband, weapons and facility damage.
3. During December of 2018, I was often assigned to transport newly committed inmates to the medical unit to be screened, which is located on the sixth floor of Jail I. The "bullpen" is a temporary holding area for inmates. In this circumstance, the bullpen on the sixth floor of Jail I is a temporary hold facility where female inmates are held prior to being seen by medical.
4. On December 10, 2018, I was on duty as a Corrections Officer within the CCCC.
5. At about 1500 hours on December 10, 2018, myself and Correction Officer Nancy Musznyec were assisting the nursing staff in meeting with inmates who were in-processing and awaiting being seen by medical.

6. At which time, I overheard a disturbance between two inmates. When I went to check on the disturbance, I observed an altercation in the bullpen area between Inmate Fatima Suleiman and Inmate Tabitha Jackson. See Exhibit 1, which is a “Combination Report” concerning the incident that I prepared within hours of the incident.
7. I observed Inmate Jackson hitting Inmate Suleiman in the face and Inmate Jackson was directed to let Inmate Suleiman go. Inmate Jackson complied, and Inmate Suleiman continued to attempt to make attacks on Inmate Jackson. Correction Officer Musznyec and I separated both inmates and I placed Inmate Jackson in handcuffs. See Exhibit 1.
8. Corporal Pritchett responded ensured both inmates were seen by medical, in accordance with CCCC policy following physical altercation between inmates.
9. After the incident, Inmate Jackson was seen by Nurse Zitellin in medical. Inmate Jackson’s vitals were checked and a physical examination was conducted. After which, Inmate Jackson was returned to her housing unit.
10. From the beginning of the alternation between Inmate Suleiman and Inmate Jackson, until Inmate Jackson was returned to her housing unit following being seen by medical, I escorted Inmate Jackson at all times. I did not observe any apparent injuries on Inmate Jackson.
11. I am aware of the Jackson’s allegations against Correction Officer Pritchett regarding the incident that occurred on December 10, 2018 within the Cuyahoga County Correction Center.

12. I did not witness Officer Pritchett slam Inmate Jackson into a desk or wall, or otherwise use excessive force against Inmate Jackson.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 26th day of January 2023.



KIMBERLY BROWN-WIGGINS

County 0001655

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



CUYAHOGA COUNTY SHERIFF'S OFFICE

A

COMBINATION REPORT

FILE# 012043

☒ INCIDENT☒ RESPONSE TO INCIDENT☒ DISCIPLINARY

(PLEASE CHECK OFF THE APPROPRIATE BOX(ES) DESIGNATING THE REPORT TYPE)

DATE: 12/10/2018

DAY: MONDAY

Page: 1 of 1 Pages

REPORTING OFFICER: KIMBERLY BROWN-WIGGINS

NAME OF PERSONS INVOLVED: 3C8B SULEIMAN, FATIMA SO#0273933 BK# 20181210037

(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SO#)

2C1 4T JACKSON, TABITHA SO#0167552 BK# 20181026046

2C1 4T JACKSON TABITHA . SO# 0167552 BK# 20181026046

NAME OF PERSON CHARGED: 3C8B SULEIMAN, FATIMA SO#0273933 BK#20181210037

(INCLUDE LAST NAME, FIRST NAME, MIDDLE INITIAL, SO# and BOOKING#)

DATE OF INCIDENT: 12/10/2018

DAY OF INCIDENT: MONDAY

TIME OF INCIDENT: 1500HRS

LOCATION OF INCIDENT: MAIN MEDICAL

NARRATIVE: (WHO, WHAT, WHERE, WHEN, WHY, HOW & ACTION TAKEN)

AT ABOUT 1455 HOURS I OFFICER BROWN-WIGGINS WAS ATTEMPTING TO HAVE THE NURSING STAFF DO INTAKE ON THE ELEVEN NEW COMMITTEE INMATES THAT HAD BEEN WAITING IN THE BULLPIN FOR OVER AN HOUR. AT THIS TIME MTA MCQUEEN RETURNED FROM LUNCH AND BEGAN TO INTAKE THE FEMALES WAITING. AS I SAT BACK DOWN AT THE MEDICAL ESCORT DESK I BEGAN TO HEAR THE NOISE LEVEL IN THE BULLPIN RISE. AS I OFFICER BROWN-WIGGINS WALKED OVER TO THE BULLPIN I OBSERVED INMATE 3C8B SULEIMAN, FATIMA SO#273933 TAKE HER RIGHT HAND AND SLAP INMATE 2C1 4T JACKSON, TABITHA SO#0167552 IN THE FACE. 2C1 JACKSON, T PUT HER HANDS UP TO BLOCK HER FACE AND ATTEMPTED TO MOVE BACK FROM INMATE 3C SULEIMAN, F. INMATE SULEIMAN THEN BALLED HER FIST UP AND HIT INMATE 2C1 JACKSON IN THE FACE AGAIN AS JACKSON WAS ATTEMPTING TO GET AWAY FROM HER. THE BULLPIN DOOR WAS OPEN AND AS MYSELF AND OFFICER MUSZYNEC CAME IN AND ATTEMPTED TO SECURE BOTH INMATES. INMATE 3C SULEIMAN, F CONTINUED TO TRY AND GET INMATE JACKSON. AT THIS TIME INMATE JACKSON GRABBED INMATE SULEIMAN AND STARTED TO HIT HER IN THE FACE. OFFICER DIRECTED JACKSON TO LET GO AND INMATE JACKSON DID SO. INMATE SULEIMAN CONTINUED TO ATTEMPT TO GET PAST ME. ONCE SULEIMAN WAS SECURED IN HANDCUFFS I OFFICER BROWN-WIGGINS THEN SECURED INMATE JACKSON IN HANDCUFFS. AT THIS TIME CPL. PRITCHETT RESPONDED AND TOOK OVER THE SITUATION.

EXHIBIT

tabbies

1

County 0001656

Jackson v. Cuyahoga County, et al. (1:20-cv-02649)



CUYAHOGA COUNTY SHERIFF'S OFFICE

WAS THERE A RESPONSE TO RESISTANCE? ☐ NO ☒ YES

IF YES, NARRATIVE OF RESPONSE USED: Response to Resistance necessary
to secure inmate Jackson's hands in handcuffs

RESPONSE TO RESISTANCE REVIEWED: [Signature]

☐ MINOR RULE(S) VIOLATION DISPOSITION REQUESTED (Not to exceed 120 hours)

CHARGES:

☒ MAJOR / SERIOUS RULE(S) VIOLATION REQUESTED

CHARGES:

2-2

2-19

FLOOR / AREA SUPERVISOR'S REVIEW: Both inmates were seen in Medical, inmate
Jackson vitals were checked by Nurse Zitello returned back to her housing unit.

Detained Jackson previously in lockup 2-19-21. Inmate Sulbman was seen by Dr.
Francis and was ordered by Dr Francis to send inmate to Metro by EMS. Due to facial
trauma, EMS HIO, Deputy Corbin & Deputies Benjamin & Cecilia KSP. was placed on 2-19-21

REQUEST FOR DISCIPLINE, IF APPLICABLE, HAS BEEN REVIEWED & FORWARDED TO THE SGT FOR FURTHER ACTION?

☒ YES ☐ NO

ALL SEGMENTS OF THIS REPORT ARE COMPLETE?

☒ YES ☐ NO

[Signature]
 (FLOOR / AREA SUPERVISOR'S SIGNATURE)

☐ MINOR RULE VIOLATION DISPOSITION APPROVED:

☐ YES

☐ NO

DISCIPLINARY ISOLATION START:

@

☐ AM

☐ PM

END:

@

☐ AM

☐ PM

☐ REQUEST FOR MAJOR / SERIOUS DISCIPLINE HAS BEEN REVIEWED & APPROVED FOR FURTHER INVESTIGATION
 AND APPROPRIATE ADMINISTRATIVE ACTION? ☒ YES ☐ NO

REPORT REVIEWED AND APPROVED:

☒ YES

☐ NO

SERGEANT'S REVIEW:

both inmates placed in lockup
lock up for further review

SERGEANT'S SIGNATURE:

DATE:

